

# EXHIBIT 4

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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*This document relates to:*

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977*  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849*  
*Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978*  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., No. 04 Civ. 1923*  
*Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970*  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065*  
*Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279*

**PLAINTIFFS' THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA**

THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES  
July 31, 2012

**PLAINTIFFS' THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on World Assembly of Muslim Youth-Saudi Arabia (hereinafter "Defendant" or "WAMY"), the following Third Set of Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia are incorporated herein by reference, except the following definition shall also apply:

1. The terms "WAMY," "Defendant," "You," and "Your" shall refer to the World Assembly of Muslim Youth and any branch office, subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer, or representative acting on the World Assembly of Muslim Youth-Saudi Arabia's behalf.

**PLAINTIFFS' THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE WORLD ASSEMBLY OF MUSLIM YOUTH – SAUDI ARABIA**

1. Please provide all documents relating to all accounts at the National Commercial Bank (a/k/a Al Ahli Bank or البنك الأهلي التجاري), established or held in the name of, on behalf of and/or for the benefit of the WAMY. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY and NCB (Al Ahli Bank), documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

**ANSWER:**

2. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between WAMY and the Third World Relief Agency ("TWRA").

**ANSWER:**

3. Please provide all documents relating to any office space shared between WAMY and the TWRA, including without limitation, the office located at Prinz-Eugen Street, 36/4/2, Vienna, Austria.

**ANSWER:**

4. Please provide all documents WAMY sent to and/or received from the TWRA, including without limitation, all documents relating to the transfer of funds between WAMY and the TWRA.

**ANSWER:**

5. Please provide all documents relating to all accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the TWRA.

**ANSWER:**

6. Please provide all documents governing, describing, detailing, or otherwise relating to the relationships between WAMY and Dr. El Fatih Hassanein and Sukarno Ali Hassanein (collectively "Hassanein Brothers"), including without limitation, all documents relating to all positions the Hassanein Brothers have held or hold within WAMY. Responsive documentation shall include, but are not limited to, copies of their personnel files, resumes,

curriculum vitae, biographies, abstracts, media reports, digests, publications, summaries, employment contracts, and/or outlines.

**ANSWER:**

7. Please provide all documents relating to the Hassanein Brothers' roles in the organization, funding, oversight, supervision, management, and/or control over WAMY's and/or the WAMY-Vienna branch office's operations (or any other WAMY branch office), including without limitation, selection of committee/board members or other officers, internal and external auditing or due diligence, budgeting, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, distribution of financial and non-monetary support from WAMY and/or the WAMY-Vienna branch office to charitable designees, and reconciliation of receipts, payments, and vouchers for any payments or distributions.

**ANSWER:**

8. Please provide all documents relating to the Hassanein Brothers' supervision, management, control of, or distribution of WAMY's and/or WAMY-Vienna branch office's funds (or any other WAMY branch office), including without limitation, all documents relating to their duties and responsibilities to determine and/or make recommendations as to which charities, humanitarian organizations, individuals, or entities should receive financial and/or non-monetary support from WAMY and/or the WAMY-Vienna branch office, and the purpose for such disbursements.

**ANSWER:**

9. Please provide all documents relating to the transfer of WAMY funds authorized by either or both of the Hassanein Brothers and/or the WAMY-Vienna branch office (and/or any WAMY official, employee, representative, or agent working on behalf of the Hassanein Brothers or the WAMY-Vienna branch office).

**ANSWER:**

10. Please provide all documents relating to all bank accounts established or held in the name of, on behalf of and/or for the benefit of the WAMY-Vienna branch office, including without limitation, all WAMY accounts over which either or both of the Hassanein Brothers had signatory authority. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, the Hassanein Brothers, and the bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

**ANSWER:**

11. Please provide all documents detailing all contributions received and disbursements made by the WAMY-Vienna branch office, including any outward payment orders, payment or expense vouchers and receipts, letters authorizing payments, cash collection and disbursement summaries, expenditure journals, receipt and disbursement reconciliation reports or summaries, and any audit, review, or analysis of receipts and disbursements.

**ANSWER:**

12. Please provide all annual, semi-annual, and other periodic reports submitted by the WAMY-Vienna branch office to WAMY headquarters in Saudi Arabia, such as annual reports, balance sheets, financial statements, bank account summaries, audits, expenditure reports or summaries, receipt and disbursement reconciliation reports or summaries, and cash collection and disbursement reports or summaries.

**ANSWER:**

13. Please provide all reports submitted by the WAMY-Vienna branch office to WAMY headquarters in Saudi Arabia concerning their operations and finances.

**ANSWER:**



14. Please provide all documents relating to the closure of WAMY's branch offices in the cities of Mumbai and Delhi, India, in connection with the Republic of India's investigation concerning the Students Islamic Movement of India ("SIMI") and WAMY's relationship with that group.

**ANSWER:**

15. Please provide all documents relating to the 1999 closure of WAMY's branch office in Chechnya per the orders of the Russian Federation.

**ANSWER:**

16. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any HAMAS-related entity, including without limitation: Al Islah Charitable Society, Bethlehem Orphan Care Society, Jenin Charity Committee, Jenin Workers Union, and the Union of Good. In the event that any WAMY subsidiary, affiliate, and/or branch office shared office space with Hamas or any Hamas-related entity, please provide such documents.

**ANSWER:**

17. Please provide all documents WAMY sent to and/or received from any HAMAS-related entity, including without limitation: Al Islah Charitable Society, Bethlehem Orphan Care Society, Jenin Charity Committee, Jenin Workers Union, and the Union of Good. Such documents shall include, but are not limited to, all documents relating to the transfer of funds between WAMY and those entities.

**ANSWER:**

18. Please provide all documents relating to any written or oral communications between or among WAMY, the Kingdom of Saudi Arabia (“KSA”), and/or the Saudi Arabian Monetary Authority (“SAMA”), which reference or address any HAMAS-related entity, including without limitation: Al Islah Charitable Society, Bethlehem Orphan Care Society, Jenin Charity Committee, Jenin Workers Union, and the Union of Good. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

19. Please provide all documents governing, describing, detailing, or otherwise relating to the appointment of any WAMY officer, director, employee, or representative to the Union of Good’s board of trustees, including but not limited to, WAMY Secretary-General Manih ibn Hammad al Juhani, Dr. Salah bin Suliaman al Wahhibi, and Dr. Abd al Wahhab Nurwali.

**ANSWER:**

20. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment A. For those persons who currently hold or have held positions within WAMY, responsive documents shall include, but are not limited to, their personnel files.

**ANSWER:**

21. Please provide all documents WAMY sent to and/or received from the persons identified in Attachment A, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.

**ANSWER:**

22. Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment A, and/or any accounts over which WAMY holds or has held signatory authority.

**ANSWER:**

23. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment B.

**ANSWER:**

24. Please provide all documents WAMY sent to, and/or received from the entities identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.

**ANSWER:**

25. Please provide all documents relating to any accounts in any banking or financial institution WAMY currently holds or has held jointly with or on behalf of the entities identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.

**ANSWER:**

26. Please provide all documents relating to any investigation or inquiry conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "United States Investigator"), any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively "Foreign Investigator"), or by the Kingdom of Saudi Arabia

or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor (collectively “KSA Investigator”), which references or addresses WAMY’s association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 2, 6, 14-25 above.

**ANSWER:**

27. Please provide copies of all documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY’s association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 2, 6, 14-25 above.

**ANSWER:**

28. Please provide all documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY’s association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 2, 6, 14-25 above. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.

**ANSWER:**

29. Please provide all documents relating to any written or oral communications between WAMY and the KSA and/or SAMA, which reference or address WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 2, 6, 14-25 above. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

30. Please provide all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of WAMY's Eastern Europe Muslim Committee. Responsive materials shall include, but are not limited to, any documents relating to any meetings of the Committee, including agendas or meeting minutes.

**ANSWER:**

31. Please provide all documents referring or relating to the detainment facility at Guantanamo Bay, Cuba and/or any detainee currently or previously incarcerated at that facility.

**ANSWER:**

32. Please provide all documents referring or relating to any internal WAMY communications, written or oral, which reference the detainment facility at Guantanamo Bay, Cuba and/or any detainee currently or previously incarcerated at that facility. Responsive

documentation shall include, but is not limited to: correspondence, letters, memoranda, reports, notes, emails, facsimiles, or otherwise.

**ANSWER:**

33. Please produce all documents governing, describing, detailing, or otherwise relating to WAMY's application, submitted to the United Nation's Committee on Non-Governmental Organizations ("Committee"), seeking consultative status with the Economic and Social Council ("ECOSOC").

**ANSWER:**

34. Please produce all documents relating to any and all concerns expressed by the Committee regarding WAMY's application, including but not limited to: (i) WAMY's links to terrorist activities and investigations concerning same; (ii) on-going legal proceedings against WAMY regarding terrorism links; (iii) WAMY's funding; (iv) WAMY's links with organizations and affiliates, including WAMY's affiliate in Iraq; and (v) WAMY youth camps. Responsive materials shall include, but are not limited to, Committee meeting minutes, audio or video recordings of Committee meetings, reports, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

35. Please produce all documents relating to WAMY's responses or answers to the concerns expressed by the Committee regarding WAMY's application. Responsive materials shall include, but are not limited to, Committee meeting minutes, audio or video recordings of Committee meetings, reports, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

36. Please produce all documents relating to WAMY's decision to withdraw its application seeking consultative status with the ECOSOC. Responsive materials shall include, but are not limited to, any internal WAMY communications, written or oral, which reference WAMY's application and the decision to withdraw the application.

**ANSWER:**

37. Please provide all documents governing, describing, detailing, or otherwise relating to the relationship between WAMY headquarters in Saudi Arabia and WAMY's Canada-branch office ("WAMY-Canada").

**ANSWER:**



38. Please provide all documents exchanged between WAMY headquarters in Saudi Arabia and WAMY-Canada, including without limitation, all documents relating to the transfer of funds between WAMY headquarters and WAMY-Canada.

**ANSWER:**

39. Please provide all annual, semi-annual, and other periodic reports submitted by WAMY-Canada to WAMY headquarters in Saudi Arabia, such as annual reports, balance sheets, financial statements, bank account summaries, audits, expenditure reports or summaries, receipt and disbursement reconciliation reports or summaries, and cash collection and disbursement reports or summaries.

**ANSWER:**

40. Please provide all reports submitted by WAMY-Canada to WAMY headquarters in Saudi Arabia concerning their operations and finances.

**ANSWER:**

41. Please provide all documents relating to the provision of funds or other material support from the Saudi Embassy in Canada, and/or any official or agency of the Kingdom of Saudi Arabia, to WAMY-Canada.

**ANSWER:**

42. Please provide all documents governing, describing, detailing, or otherwise relating to the investigation and audit conducted by the Canada Revenue Agency (“CRA”) concerning WAMY-Canada and/or WAMY, and the Canadian government’s determination to revoke WAMY’s designation as a tax exempt registered charity.

**ANSWER:**

43. Please provide all documents relating to any written or oral communications between Canadian authorities and WAMY-Canada and/or WAMY regarding the CRA’s investigation and audit. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

44. Please provide copies of all documents that have been seized by, or produced by WAMY-Canada and/or WAMY to, Canadian authorities in relation to the CRA’s investigation and audit.

**ANSWER:**

45. Please provide all documents governing, describing, detailing, or otherwise relating to WAMY-Canada's and/or WAMY's relationship with the Benevolence International Fund ("BIF-Canada"). Responsive materials shall include, but are not limited to, all documents concerning Mohamed Khatib and any other individual(s) working simultaneously for WAMY-Canada and BIF-Canada, shared office space, shared contact information, and shared bank accounts.

**ANSWER:**

46. Please provide all documents governing, describing, detailing, or otherwise relating to WAMY-Canada's and/or WAMY's relationship with the Benevolence International Foundation ("BIF-USA").

**ANSWER:**

47. Please provide all documents WAMY-Canada or WAMY sent to, and/or received from, BIF-USA, including without limitation, all documents relating to the transfer of funds between WAMY-Canada and/or WAMY and BIF-USA.

**ANSWER:**

48. Please provide all documents relating to all accounts at the Bank of Montreal established or held in the name of, on behalf of and/or for the benefit of the WAMY-Canada, WAMY, and/or BIF-Canada. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY-Canada, WAMY, BIF-Canada, and Bank of Montreal, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

**ANSWER:**

49. Please provide all documents relating to any written or oral communications between or among WAMY, WAMY-Canada, Dr. Ayman al Taher, Talhah al Jarad, and/or any other WAMY Personnel concerning the CRA's investigation and audit. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

50. Please provide all documents relating to any written or oral communications between or among WAMY, WAMY-Canada, Dr. Ayman al Taher, Talhah al Jarad, and/or any other WAMY Personnel concerning WAMY's efforts to obtain documentation and other materials in the possession of WAMY-Canada. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.

**ANSWER:**

51. Please provide all documents relating in any way to WAMY meetings, correspondence, statements, or other communications concerning the CRA's investigation and audit.

**ANSWER:**

52. Please provide a copy of the June 2001 report presented to Prince Sultan bin Abdul Aziz al Saud by WAMY Secretary-General Manih ibn Hammad al Juhani and members of the WAMY Board of Trustees.

**ANSWER:**

Dated: July 31, 2012

Respectfully submitted,

*MDL 1570 Plaintiffs' Exec. Committees/gor*  
THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEES

**ATTACHMENT A**

Mustafa Ceric  
Dr. Ibrahim bin Muhammad bin Yusuf al Faiz (a/k/a Dr. Ibrahim al Fayez)  
Mohagher Iqbal  
Ashiq Hussein Faktoo  
Rachid Ghannouchi  
Kemal Helbawi  
Talhah al Jarad  
Hazem Mohammed Kashmiri  
Sheikh Jamil al Rahman Kashmiri  
Sheikh Abd al Wahhab bin Abd al Wahid al Khalaji  
Mohamed Khatib  
Sheikh Salah al Luhaidan  
Sheikh al Mawali  
Sheikh Sajed Mir  
Sheikh Abdullah Ben Nasser Rahmani  
Ibrahim Sulaiman  
Dr. Ayman al Taher  
Chaudhry Mohammed Yaqub  
Sheikh Ahmed Yassin  
Saleh al Zahrani

**ATTACHMENT B**

Ahl-i Hadith  
Al Furqan Foundation  
Ansar Al Islam  
Deeander Anjuman  
Eritrean Islamic Jihad  
Ittehadul Munzamat al Tulabiyya of Kuwait  
Jama'tul Mujahideen Bangladesh  
Jamiatul Khairia of Qatar  
Muslim United Students Association of Maldives  
Rohingya Solidarity Organization  
Taibah International  
Taibah International – Bosnian Branch


**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Plaintiffs' Third Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia was served via electronic mail this 31st day of July 2012, upon:

Omar T. Mohammedi, Esq.  
Law Firm of Omar T. Mohammedi, LLC  
Woolworth Building  
233 Broadway, Suite 801  
New York, New York 10279

Alan R. Kabat, Esq.  
Bernabei & Wachtel, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7124

(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

  
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J. Scott Tarbutton, Esq.